

D.N. FBT-CV21-5045439-S

: SUPERIOR COURT

JASON P GLADSTONE

: J. D. OF FAIRFIELD

V.

: AT BRIDGEPORT

LAURA KARSON

: JUNE 24, 2021

AMENDED COMPLAINT AS A MATTER OF RIGHT  
PURSUANT TO P.B§10-59 AND C.G.S§52-128

GENERAL ALLEGATIONS

1. The plaintiff, JASON P GLADSTONE, is an individual residing in Fairfield, Connecticut.
2. The defendant, LAURA KARSON ("Karson"), is an individual residing in Fairfield, Connecticut, and at all times mentioned in this Complaint, was a Town of Fairfield Representative Town Meeting (RTM) District 4 Representative.
3. On March 19, 2021, Superintendent of Fairfield Schools Mike Cummings sent out an e-mail stating his personal opinions about racism in the country, the Town of Fairfield community and Town of Fairfield Public School staff and children (See Exhibit A as if full alleged herein and made a part hereof).
4. Soon thereafter, the Plaintiff sent an e-mail responding and copied many town officials and parents of children within the Fairfield Public School System disagreeing with his characterization,

provided an opinion regarding his policies toward the children's return to school and copied many town officials and parents regarding those concerns (See Exhibit B as if fully alleged herein and made a part hereof).

5. That email authored by the Plaintiff prompted a series of inquiries, concerns and a respectful discussion regarding the issues posed by Superintendent Mike Cummings. The Defendant Karson made only one comment during that entire discussion of "Thank you Karen!". (See Exhibit B as if fully alleged herein and made a part hereof).

6. On or about March 24, 2021 and unbeknownst to the Plaintiff, the defendant LAURA KARSON, sent a private unsolicited e-mail (hereinafter "March 24, 2021 e-mail") to Town of Fairfield First Selectwoman Brenda Kupchick containing many defamatory statements specifically naming the Plaintiff including but not limited to allegations of inherent bias, offensive conduct, disrespectful conduct, "white fragility", asserted that the Plaintiff was tearing down an educator and that the Plaintiff experienced a discomfort and defensiveness when confronted by racial inequality and injustice (See Exhibit C attached hereto and made a part hereof as if fully alleged herein).

7. The aforesaid March 24, 2021 e-mail was only directed to First selectwoman Brenda Kupchick, with no other persons or entities copied, attached, or included at any time.

8. The aforesaid March 24, 2021 e-mail was not public at the time it was sent, was not accessible to any other person or person(s) other than First selectwoman Brenda Kupchick and the defendant Karson, and was made within a private forum that could not be read or accessed by interest person(s).

9. Subsequent to the delivery of aforesaid e-mail and unbeknownst to the Plaintiff, the defendant KARSON without justification, cause, inquiry, demand, or request then posted the defamatory March 24, 2021 e-mail on a private Facebook page named "Fairfield Standing United" (hereinafter "Facebook post") for which the Plaintiff neither had access or knowledge. (See Exhibit D attached hereto and made a part hereof as if fully alleged herein).

10. Subsequent to the Facebook post, the defendant Karson then repeatedly encouraged, liked, and stimulated public comment and provided information regarding the Facebook post. (See Exhibit D attached hereto and made a part hereof as if fully alleged herein).

11. On or about April 12, 2021, the Plaintiff was alerted as to the libelous statements, and sent a written letter demanding a retraction of the defamatory comments as false in the same manner in which they were made (See Exhibit E attached hereto and made a part hereof as if fully alleged herein).

12. On or about April 21, 2021, the Defendant posted an alleged retraction on the "Fairfield Standing United" Facebook page, but failed, refused, or neglected to retract the statements an false or untrue, and failed, refused and neglected to send a retraction to First selectwoman Brenda Kupchick, nor did she send a copy to the Plaintiff. (See Exhibit F attached hereto and made a part hereof as if fully alleged herein).

13. Sometime thereafter and for many weeks, the Defendant Karson alerted, encouraged and stimulated additional people to specifically attack, defame, threaten, intimidate, demoralize, and accuse the Plaintiff of unlawful, immoral and unethical behavior through a long series of posts upon the Facebook page for which the Plaintiff did not have access nor was able to defend. (See Exhibit F attached hereto and made a part hereof as if fully alleged herein).

14. At no time since the original March 19, 2021 email to superintendent Mike Cummings and the discussions that followed that day as described above, did the Plaintiff respond, post, retort or send any communication of any kind directed to the Defendant Karson, or communicate, respond, post, retort or send any communication to any of the other individuals posting said defamatory and libelous statements upon the Facebook page "Fairfield Standing United" other than the retraction demand.

FIRST COUNT (vs. Laura Karson) (Intentional Infliction of Emotional Distress):

1-14. Paragraphs One through Fourteen of the General Allegations are hereby made One through Fourteen of the First Count as if fully alleged and made a part hereof.

15. The aforementioned March 24, 2021 e-mail and Facebook Posts specifically named the Plaintiff only and contained numerous false statements about the Plaintiff, were intended to injure the Plaintiff's reputation, diminish his self-esteem, respect, goodwill and confidence in the community, questioned his morality, injure his business and professional reputation, threaten his livelihood, threatened to weaponize the State of Connecticut grievance committee, damage the Plaintiff's business and were libelous per se and/or libelous per quod.

16. The statements published were false and untrue, were published directly to First selectwoman Brenda Kupchick and to many hundreds of members of the Facebook group 'Fairfield Standing United', and upon information and belief, to numerous other people not known by the Plaintiff.

17. Because the Defendant named no other person but the Plaintiff, the said statements were sent and posted with malicious intent and were intended to inflict emotional distress upon the Plaintiff.

18. The defendant Karson knew or should have known that emotional distress was a likely result of her malicious conduct when she sent the aforesaid e-mail, posted the aforesaid e-mail

on the Facebook group "Fairfield Standing United", specifically identified only the Plaintiff and then encouraged and stimulated additional defamatory comments which directly resulted in additional people to attack, defame, intimidate, threaten, demean, and make defamatory statements which were also libelous per se and/or libelous per quod.

19. The Defendant Karson's conduct was extreme and outrageous and were meant to excite an adverse, derogatory and/or unpleasant feeling and/or opinion about the Plaintiff, damage his professional and personal reputation and were made without cause.

20. The defendant LAURA KARSON knew the aforementioned statements to be false and untrue, possesses no evidence the Plaintiff was suffering from a malady named "white fragility", was inherently biased, was tearing down an educator, was offensive and/or disrespectful and the Defendant's actions were extreme and outrageous and caused the plaintiff to experience extreme, severe, and pervasive emotional distress.

21. Subsequent to the Plaintiff being specifically identified and publicly shamed, attacked, defamed, intimidated, threatened, and demeaned, the Plaintiff has received threatening phone messages and a threatening letter which has created fear of bodily injury. (See Exhibit G edited for offensive content and attached hereto and made a part hereof as if fully alleged herein).

22. The statements were untrue, false, defamatory, and the defendant Karson's malicious conduct are the direct cause of the Plaintiff's emotional distress, and as a direct result of the

foregoing, the plaintiff sustained and will continue to sustain pain and suffering and the following injuries, some or all of which may be permanent in nature:

- a) Nausea;
- b) headaches;
- c) anxiety;
- d) fear of bodily injury;
- e) feelings of shame;
- f) feelings of guilt;
- g) embarrassment;
- h) loss of sleep;
- i) loss of appetite;
- j) loss of focus;
- k) Head pain;
- l) Stomach pain;
- m) general feeling of malaise.

23. As a further result of the foregoing injuries, the plaintiff:

- a) has and will continue to incur medical, hospital, drug, medical equipment, and therapeutic expenses in the future;

- b) has suffered and will continue to experience pain and suffering;
- c) has suffered and will continue to experience mental anguish, mental anxiety, and emotional distress in the future;
- d) has suffered permanent impairment of his abilities to carry on life's activities which he had enjoyed before the collision;
- d) has lost time from his gainful employ and will continue to lose time from his gainful employ.

SECOND COUNT (vs. Laura Karson): (Negligent Infliction of Emotional Duress)

1-14. Paragraphs One through Fourteen of the General Allegations are hereby made One through Fourteen of the Second Count as if fully alleged and made a part hereof.

15. The aforementioned March 24, 2021 e-mail and Facebook Posts specifically named the Plaintiff only, contained numerous false and untrue statements about the Plaintiff, and as such her conduct created an unreasonable risk of causing the Plaintiff emotional distress because it specifically named the Plaintiff and no other person which resulted in many additional people to attack, defame, intimidate, threaten, demean, and were libelous per se and/or libelous per quod.

16. The statements published were false and untrue, were published directly to First selectwoman Brenda Kupchick and to many hundreds of members of the Facebook group



‘Fairfield Standing United’), and upon information and belief, to numerous other people not known by the Plaintiff.

17. As a direct result of the foregoing negligent conduct, it damaged the Plaintiff’s reputation, diminishing his self-esteem, respect, goodwill and confidence in the community, questioned his morality, injuring his business and professional reputation, threaten his livelihood, threatened to weaponize the State of Connecticut grievance committee, and damaged the Plaintiff’s business.

18. The Defendant made said statements with a negligent disregard for the Plaintiff’s reputation, created an unreasonable risk of causing emotional distress upon the Plaintiff and defendant Karson should have realized that her conduct involved an unreasonable risk of causing the Plaintiff emotional distress, and that emotional distress resulted in illness or bodily harm.

19. The defendant LAURA KARSON knew the aforementioned statements to be false and untrue, possesses no evidence the Plaintiff was suffering from a malady named “white fragility”, was inherently biased, was tearing down an educator, was offensive and/or disrespectful and the Defendant's actions were extreme and outrageous and caused the plaintiff to experience extreme, severe, and pervasive emotional distress.

20. Subsequent to the Plaintiff being specifically identified and publicly shamed, attacked, defamed, intimidated, threatened, and demeaned, the Plaintiff has received threatening phone messages and a threatening letter which has created fear of bodily injury (See Exhibit G attached hereto and made a part hereof as if fully alleged herein).

21. The statements were untrue, false, defamatory, and the defendant Karson's malicious conduct are the direct cause of the Plaintiff's the severe emotional distress, and as a direct result of the foregoing, the plaintiff sustained and will continue to sustain pain and suffering and the following injuries, some or all of which may be permanent in nature:

- n) Nausea;
- o) headaches;
- p) anxiety;
- q) fear of bodily injury;
- r) feelings of shame;
- s) feelings of guilt;
- t) embarrassment;
- u) loss of sleep;
- v) loss of appetite;
- w) Head pain;

- x) Stomach pain;
- y) loss of focus;
- z) general feeling of malaise.

22. As a further result of the foregoing injuries, the plaintiff:

- a) has incurred and will continue to incur medical, hospital, drug, medical equipment, and therapeutic expenses in the future;
- b) has suffered and will continue to experience pain and suffering;
- c) has suffered and will continue to experience mental anguish, mental anxiety, and emotional distress in the future;
- d) has suffered permanent impairment of his abilities to carry on life's activities which he had enjoyed before the collision;
- d) has lost time from his gainful employ and will continue to lose time from his gainful employ.

THIRD COUNT (vs. Laura Karson) (Defamation for E-mail to First selectwoman Kupchick):

1. The plaintiff, JASON P GLADSTONE, is an individual residing in Fairfield, Connecticut.

2. The defendant, LAURA KARSON (“Karson”), is an individual residing in Fairfield, Connecticut, and at all times mentioned in this Complaint, was a Town of Fairfield Representative Town Meeting (RTM) District 4 Representative.

3. On March 19, 2021, Superintendent of Fairfield Schools Mike Cummings sent out an e-mail stating his personal opinions about racism in the country, the Town of Fairfield community and Town of Fairfield Public School staff and children (See Exhibit A as if full alleged herein and made a part hereof).

4. Soon thereafter, the Plaintiff sent an e-mail responding and copied many town officials and parents of children within the Fairfield Public School System disagreeing with his characterization, provided an opinion regarding his policies toward the children’s return to school and copied many town officials and parents regarding those concerns (See Exhibit B as if fully alleged herein and made a part hereof).

5. That email authored by the Plaintiff prompted a series of inquiries, concerns and a respectful discussion regarding the issues posed by Superintendent Mike Cummings. The Defendant Karson made only one comment during that entire discussion of “Thank you Karen!”. (See Exhibit B as if fully alleged herein and made a part hereof).

6. On or about March 24, 2021 and unbeknownst to the Plaintiff, the defendant LAURA KARSON, sent a private unsolicited e-mail specifically naming the Plaintiff only (hereinafter "March 24, 2021 e-mail") to Town of Fairfield First Selectwoman Brenda Kupchick containing many defamatory statements, including but not limited to allegations of inherent bias, offensive conduct, disrespectful conduct, "white fragility", asserted that the Plaintiff was tearing down an educator and that the Plaintiff experienced a discomfort and defensiveness when confronted by racial inequality and injustice (See Exhibit C attached hereto and made a part hereof as if fully alleged herein).

7. The aforesaid March 24, 2021 e-mail was only directed to First selectwoman Brenda Kupchick, with no other persons or entities copied, attached, or included at any time.

8. The aforesaid March 24, 2021 e-mail was not public at the time it was sent, was not accessible to any other person or person(s) other than First selectwoman Brenda Kupchick and the defendant Karson, and was made within a private forum that could not be read or accessed by interest person(s).

9. On or about April 12, 2021, the Plaintiff was alerted as to the libelous statements, and sent a written letter demanding a retraction of the defamatory comments as false in the same

manner in which they were made (See Exhibit E attached hereto and made a part hereof as if fully alleged herein).

10. The Defendant has failed, refused, or neglected to retract the statements as false or untrue, and failed, refused and neglected to send a retraction to First selectwoman Brenda Kupchick.

11. At no time since the original March 19, 2021 email to superintendent Mike Cummings and the discussions that followed that day as described above, did the Plaintiff respond, post, retort or send any communication of any kind directed to the Defendant Karson, or communicate, respond, post, retort or send any communication to any of the other individuals posting said defamatory and libelous statements upon the Facebook page "Fairfield Standing United" other than the retraction demand.

12. When making said statements and transmitting the aforesaid email to First selectwoman Brenda Kupchick, the Defendant identified the plaintiff by name, knew the statements that were contained in the aforementioned e-mail were untrue and false and published those statements to First selectwoman Brenda Kupchick.

13. The defendant Karson's March 24, 2021 e-mail is defamatory, libelous per quod and libelous per se, and it has caused the injury to the Plaintiff's reputation, diminishing his self-

esteem, respect, goodwill and confidence in the community, questioned his morality, injuring his business and professional reputation, threaten his livelihood, damaged the Plaintiff's business and excited an adverse, derogatory, or unpleasant feelings or opinions against him in the community.

14. The Defendant is liable to the plaintiff for the damages he has incurred as a result of the aforementioned conduct, including but not limited to the injury to his reputation, humiliation, mental suffering and actual damages for which the Defendant's defamatory conduct has caused him.

15. The Plaintiff has received threatening phone messages and a threatening letter which has created fear of bodily injury. (See Exhibit G edited for offensive content and attached hereto and made a part hereof as if fully alleged herein).

16. The statements were untrue, false, defamatory, and the defendant Karson's defamatory statement is the direct cause of the Plaintiff's the severe emotional distress, and as a direct result of the foregoing, the plaintiff sustained and will continue to sustain pain and suffering and the following injuries, some or all of which may be permanent in nature:

- a. Nausea;
- b. headaches;
- c. anxiety;

- d. fear of bodily injury;
- e. feelings of shame;
- f. feelings of guilt;
- g. embarrassment;
- h. loss of sleep;
- i. loss of appetite;
- j. Head pain;
- k. Stomach pain;
- l. loss of focus;
- m. general feeling of malaise.

17. As a further result of the foregoing injuries, the plaintiff:

- a) has incurred and will continue to incur medical, hospital, drug, medical equipment, and therapeutic expenses in the future;
- b) has suffered and will continue to experience pain and suffering;
- c) has suffered and will continue to experience mental anguish, mental anxiety, and emotional distress in the future;
- d) has suffered permanent impairment of his abilities to carry on life's activities which he had enjoyed before the collision;



d) has lost time from his gainful employ and will continue to lose time from his gainful employ.

18. The defendant Karson is liable to the Plaintiff for the damages he has incurred as a result of the aforementioned conduct, including but not limited to all actual or special damages he has incurred as a result of the aforementioned defamatory conduct.

FOURTH COUNT (vs. Laura Karson) (Defamation for Facebook post):

1-14. Paragraphs One through Fourteen of the General Allegations are hereby made One through Fourteen of the Fourth Count as if fully alleged and made a part hereof.

15. When making said statements and transmitting the aforesaid email to First selectwoman Brenda Kupchick, the Defendant identified the plaintiff by name, knew the statements that were contained in the aforementioned e-mail were untrue and false and published those statements to First selectwoman Brenda Kupchick.

16. The defendant Karson's March 24, 2021 e-mail is defamatory, libelous per quod and libelous per se, and it has caused the injury to the Plaintiff's reputation, diminishing his self-esteem, respect, goodwill and confidence in the community, questioned his morality, injuring his business and professional reputation, threaten his livelihood, damaged the Plaintiff's business and excited an adverse, derogatory, or unpleasant feelings or opinions against him in the community.

17. The statements published were false and untrue, were published to hundreds of members of the Facebook group 'Fairfield Standing United'', and upon information and belief, to numerous other people not known by the Plaintiff.

18. The Defendant is liable to the plaintiff for the damages he has incurred as a result of the aforementioned conduct, including but not limited to the injury to his reputation and for the humiliation and mental suffering which the Defendant's defamatory conduct has caused him.

19. The statements were untrue, false, defamatory, and the defendant Karson's defamatory statement is the direct cause of the Plaintiff's the severe emotional distress, and as a direct result of the foregoing, the plaintiff sustained and will continue to sustain pain and suffering and the following injuries, some or all of which may be permanent in nature:

- n. Nausea;
- o. headaches;
- p. anxiety;
- q. fear of bodily injury;
- r. feelings of shame;
- s. feelings of guilt;
- t. embarrassment;

- u. loss of sleep;
- v. loss of appetite;
- w. Head pain;
- x. Stomach pain;
- y. loss of focus;
- z. general feeling of malaise.

20. As a further result of the foregoing injuries, the plaintiff:

- a) has incurred and will continue to incur medical, hospital, drug, medical equipment, and therapeutic expenses in the future;
- b) has suffered and will continue to experience pain and suffering;
- c) has suffered and will continue to experience mental anguish, mental anxiety, and emotional distress in the future;
- d) has suffered permanent impairment of his abilities to carry on life's activities which he had enjoyed before the collision;
- d) has lost time from his gainful employ and will continue to lose time from his gainful employ.

21. The defendant Karson is liable to the Plaintiff for the damages he has incurred as a result of the aforementioned conduct, including but not limited to all actual or special damages he has incurred as a result of the aforementioned defamatory conduct.

FIFTH COUNT (Civil Conspiracy v. Laura Karson)

1-23. The plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 23 of the First Count as though said allegations were set forth more fully herein.

23-45. The plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 22 of the Second Count as though said allegations were set forth more fully herein.

46-63. The plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 17 of the Third Count as though said allegations were set forth more fully herein.

64-81. The plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 21 of the Fourth Count as though said allegations were set forth more fully herein.

82. The Defendant Karson alerted, encouraged and stimulated additional people to specifically attack, defame, threaten, intimidate, demoralize, and accuse the Plaintiff of unlawful, immoral and unethical behavior through a long series of posts upon the Facebook page for which the Plaintiff did not have access nor was able to defend. (See Exhibit F attached hereto and made a part hereof as if fully alleged herein).

83. The individuals described in Paragraph 82 of the Fifth Count were not involved or included in the original public discussion of March 19, 2021, were not involved in receiving a copy of the March 19, 2021 email by the Plaintiff, had no knowledge, understanding or access to the original public discussion which occurred on March 19, 2021, and prior to their Facebook posts on March 24, 2021 and thereafter had no knowledge of the circumstances surrounding the public discussion of March 19, 2021 and/or the e-mails therein.

84. Notwithstanding the allegations contained in Paragraph 83 above, the individuals submitting Facebook posts on or after March 24, 2021 unequivocally demonstrating they suddenly had intimate knowledge, understanding and copies of the March 19, 2021 emails, the above referenced lawsuit, and the circumstances surrounding the same.

85. As a result of the foregoing, it is apparent that the Defendant Karson conspired, alerted, encouraged, stimulated and provided the information and documents for which the individuals used to damage the Plaintiff's reputation, diminishing his self-esteem, respect, goodwill and confidence in the community, questioned his morality, injuring his business and professional reputation, threaten his livelihood, threaten to weaponize the State of Connecticut Grievance Committee, and damage the Plaintiff's business.

86. The defendant LAURA KARSON committed an overt act with one or more other individuals to intentionally inflict emotional distress, negligently inflicted emotional distress,

and defame the Plaintiff when she specifically named the Plaintiff, publicly shamed the Plaintiff, conspired, stimulated, encouraged and portrayed the plaintiff in a false light.

83. The defendant KARSON acted pursuant to the scheme and in furtherance of the object to intentionally inflict emotional distress, negligently inflicted emotional distress, defame and/or portrayed the plaintiff in a false light.

84. Subsequent to the Plaintiff being specifically identified and publicly shamed, attacked, defamed, intimidated, threatened, and demeaned, the Plaintiff has received threatening phone messages and a threatening letter which has created fear of bodily injury. (See Exhibit G edited for offensive content and attached hereto and made a part hereof as if fully alleged herein).

85. The statements were untrue, false, defamatory, and the defendant Karson's malicious conduct are the direct cause of the Plaintiff's emotional distress, and as a direct result of the foregoing, the plaintiff sustained and will continue to sustain pain and suffering and the following injuries, some or all of which may be permanent in nature:

- a. Nausea;
- b. headaches;
- c. anxiety;
- d. fear of bodily injury;
- e. feelings of shame;

- f. feelings of guilt;
- g. embarrassment;
- h. loss of sleep;
- i. loss of appetite;
- j. loss of focus;
- k. Head pain;
- l. Stomach pain;
- m. general feeling of malaise.

86. As a further result of the foregoing injuries, the plaintiff:

- a) has and will continue to incur medical, hospital, drug, medical equipment, and therapeutic expenses in the future;
- b) has suffered and will continue to experience pain and suffering;
- c) has suffered and will continue to experience mental anguish, mental anxiety, and emotional distress in the future;
- d) has suffered permanent impairment of his abilities to carry on life's activities which he had enjoyed before the collision;
- d) has lost time from his gainful employ and will continue to lose time from his gainful employ.

87. The defendant Karson is liable to the Plaintiff for the damages he has incurred as a result of the aforementioned conduct, including but not limited to all actual or special damages he has incurred as a result of the aforementioned defamatory conduct.

88. All of the foregoing action by defendant KARSON damaged the Plaintiff.

WHEREFORE, the Plaintiff seeks the following relief:

1. Compensatory damages, including actual damages and consequential damages;
2. Damages for physical injuries;
3. Damages for emotional distress
4. Punitive damages, including but not limited to, attorneys' fees;
5. Costs;
6. Any other relief the Court deems appropriate.

THE PLAINTIFF

BY: 405756  
Jason P. Gladstone, Esq.  
46 Main Street  
New Canaan, CT 06840  
Tel. (203) 972-8100  
(405756)



## EXHIBIT A

## Jason Gladstone

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**From:** reghelp@fairfieldschools.org  
**Sent:** Friday, March 19, 2021 10:17 AM  
**To:** Jason Gladstone  
**Subject:** Msg from Mike Cummings - 3/19/21 - -- A Message From: Mike Cummings

Good morning

This past summer, in the wake of national demonstrations and conversations about racism, I was confronted with my own personal anger, shame, and fear about the long history of racism in our country. I committed to addressing the greater issues within our school system and leading us to be part of the solution. Since then, our equity work has begun in earnest and continues to be an integral part of our planning and action.

Now, when acts of violence against Asian Americans are on the rise and in the news, I am compelled to recognize that our equity work must be broad and truly inclusive. This is not a "program," this is an ongoing commitment to changing our culture, as a school district and as a community. So once again I reaffirm the commitments I made last spring.

Fairfield Public Schools is committed to continuing to examine our own policies, practices, beliefs, and actions so that we can become aware of the hurt we may cause students, staff, and the community, when we are unmindful of our own inherent biases. We continue commit to raising staff awareness of those biases because they stand in the way of the fulfillment of our district mission, "to ensure that every student acquires the knowledge and skills needed to be a lifelong learner, responsible citizen, and successful participant in an ever-changing global society through a comprehensive educational program." If we are not aware of our own beliefs and actively work to eliminate our prejudices then we cannot truly educate every child.

We commit to being anti-racist in our expectations and actions.

We commit to being part of a community dialogue that confronts the issues that drive us apart so that we may heal as one.

We commit, above all, to listening, to fully investigating, and to addressing, allegations of racist behavior, actions, policies, or practices, in our school system.

We know that current events impact students and families in many different ways. If your child needs support, please contact your building principal or school counselor. Together, when we commit to living our values, we will make our schools, our community and our world stronger, safer, better.

Take care,  
Mike

Mike Cummings  
Superintendent of Schools

EXHIBIT B

## Jason Gladstone

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**From:** Jason Gladstone  
**Sent:** Friday, March 19, 2021 10:49 AM  
**To:** 'Mcummings@fairfieldschools.org'; 'bkupchick@gmail.com'; 'Mcummings@fairfieldschools.org'; 'firstselectwoman@fairfieldct.org'; 'sclary@fairfieldct.org'; 'tony.hwang@cga.ct.gov'; 'brian.farnen@housegop.ct.gov'; 'Cristin.MccarthyVahey@cga.ct.gov'; 'laura.devlin@cga.ct.gov'; 'rtm@fairfieldct.org'; 'Amiebelile@gmail.com'; 'lcaramore@me.com'; 'KIAAIN4EVER@yahoo.com'; 'emilyconks5@gmail.com'; 'Laura Corsi'; 'jamarrin'; 'nafisasm@yahoo.com'; 'Alexandra D'Elia'; 'imfaw@hotmail.com'; 'tomandsuzy@optonline.net'; 'jackiegallagher@prodigy.net'; 'Dana Gladstone'; 'Linda Grace'; 'Jenholfelder@gmail.com'; 'eidieu11@gmail.com'; 'priscillaigram@gmail.com'; 'vihlefeld@gmail.com'; 'Elke Kenyon'; 'faikakhalid83@yahoo.com'; 'mck266@optonline.net'; 'glendaoco@optonline.net'; 'Jenn O'Hara'; 'stephanie ortiz'; 'amprossi@icloud.com'; 'ftoslluku@yahoo.com'; 'webmaster.dph@ct.gov'; 'lcaramore@me.com'; 'Laura Corsi'; 'Alexandra D'Elia'; 'Priscilla Igram'; 'Jackie Gallagher'; 'Elke Kenyon'; 'Linda Grace'; 'Jenn O'Hara'; 'Mck266'; 'Vicki Ihlefeld'; 'stephanie ortiz'; 'Jeff OConnell'; 'Mark McKenna'; 'CT Fury 05'; 'glendaoco'; 'Flora Toslluku'; 'cohara001@gmail.com'; 'Tom Grace'; 'Timothy Ihlefeld'; 'Kevin Cullinan'; 'Robert Kenyon'; 'bdanazumi@yahoo.com'; 'kevincon4665@gmail.com'; 'ab\_igram@yahoo.com'; 'dgladstone@sof328.com'; 'Jason Gladstone'; 'jamarrin'; 'imfaw@hotmail.com'; 'nafisasm@yahoo.com'; 'Massimo D'Elia'; 'wjgj@prodigy.net'; 'Warde Gridiron'; 'cohara001'; 'davedefonce@yahoo.com'; 'photop33@gmail.com'; 'ethanshome@optonline.net'; 'mangano68@yahoo.com'; 'DGLadstone@sof328.com'; 'anaantonia29@hotmail.com'; 'd.vyal@yandex.ru'; 'michelle\_moore@me.com'; 'kevin.moore@me.com'; 'gregschmidt@gmail.com'; 'schmidt386@gmail.com'; 'hilary1088@gmail.com'; 'jon.plessner@gmail.com'; 'Vigeant, Stacie'; 'garyvigeant67@gmail.com'; 'jennohara21@gmail.com'; 'erinmelson@gmail.com'; 'Jason Gladstone'; 'Heather Petrecca'; 'Judith Medor'; 'Leonard Petrucelli'; 'josephgulbin1@gmail.com'; 'r.caramore@me.com'  
**Subject:** 3/19/21 Message

Mr. Cummings,

I am truly offended that you would insinuate that I am inherently racist or biased within your March 19, 2021 e-mail. You are truly out of bounds with your message, and I am concerned that you are incapable of understanding this community and the people that reside here. Shocking would be a good word to describe your message. How can you possibly claim that the people of this community "are not aware of our own beliefs", or "inherently bias" and do "not actively work to eliminate our prejudices". Our kids need a superintendent that will stand up and believe in them, not someone who calls the community inherently biased and unknowingly racist. Your failures as a superintendent to get these kids back in school did more damage to these kids than your unsubstantiated and spurious claims of racism within this great community. Truly disappointing and out of touch with the great families that live in this community.

Jason P. Gladstone, Esq.

## Jason Gladstone

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**From:** Timothy Ihlefeld <tcihlefeld@gmail.com>  
**Sent:** Friday, March 19, 2021 11:59 AM  
**To:** Jason Gladstone  
**Cc:** Mcummings@fairfieldschools.org; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; Warde Gridiron; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hilary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; Judith Medor; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com  
**Subject:** Re: 3/19/21 Message

This email to the Fairfield community is troubling to say the least. Does the town of Fairfield and our government representatives also agree that we are all inherently racist and need to be re-educated?

Or, is this Mr. Cummiings personal guilt being projected on all others in a progressive way to make himself feel better? I dont know the answer, but I can tell you personally, that I am tired of being told my family and I are racist, the US is an inherently racist country, Police are racist, Conservatives are racist, in short, anyone who doesnt agree with the Progressive Liberal media, Big Tech, Teachers Unions, and associated Democrat party affiliates.

Mr. Cummings, your personal beliefs have no business guiding our school district instruction. You should resign immediately, or be removed. And we wonder why so many are moving south...oh wait, all of those folks must be all racist, who needs them anyway...

Just my two cents...

I would like to hear from our elected officials on my question above, thank you

Tim

On Fri, Mar 19, 2021 at 11:21 AM Jason Gladstone <[Jason@ltr-law.com](mailto:Jason@ltr-law.com)> wrote:

## Jason Gladstone

---

**From:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>  
**Sent:** Friday, March 19, 2021 12:04 PM  
**To:** Timothy Ihlefeld; Jason Gladstone  
**Cc:** bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hilary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** RE: [EXTERNAL]Re: 3/19/21 Message

Good afternoon

I speak as Superintendent of Schools of the Fairfield Public Schools. In my capacity I am aware of the many issues which our students and staff confront every day. I speak to the need to change our behaviors so we are a more inclusive school system

Regretfully you would rather cast personal aspersions on me than be aware of what is happening in our schools.

Mike

**From:** Timothy Ihlefeld <tcihlefeld@gmail.com>  
**Sent:** Friday, March 19, 2021 11:59 AM  
**To:** Jason Gladstone <Jason@ltr-law.com>  
**Cc:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi <llcorsi@optonline.net>; jamarrin <jamarrin@aol.com>; nafisasm@yahoo.com; Alexandra D'Elia <adelia214@gmail.com>; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace <ljgrace@optonline.net>; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon <elkekenyon@gmail.com>; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara <jennohara@comcast.net>; stephanie ortiz <stephortiz79@gmail.com>; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell

## Jason Gladstone

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**From:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>  
**Sent:** Friday, March 19, 2021 12:50 PM  
**To:** photop33@gmail.com  
**Cc:** Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** RE: [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

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We address these on a case by case basis with the goal of educating students to understand how their actions hurt others. We also work with staff to listen more carefully to students when these issues are raised and to acknowledge how they can be hurtful.

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**Sent:** Friday, March 19, 2021 12:37 PM  
**To:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>  
**Cc:** Timothy Ihlefeld <tcihlefeld@gmail.com>; Jason Gladstone <Jason@ltr-law.com>; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi <llcorsi@optonline.net>; jamarrin <jamarrin@aol.com>; nafisasm@yahoo.com; Alexandra D'Elia <adelia214@gmail.com>; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace <ljgrace@optonline.net>; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon <elkekenyon@gmail.com>; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara <jennohara@comcast.net>; stephanie ortiz <stephortiz79@gmail.com>; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell <oconnelljeff0750@gmail.com>; Mark McKenna <mckennam@me.com>; CT Fury 05 <nortizct80@gmail.com>; cohara001@gmail.com; Tom Grace <tpgrace@optonline.net>; Kevin Cullinan <kjcullinan@aol.com>; Robert Kenyon <rkenyon\_2000@yahoo.com>; bdanazumi@yahoo.com;

## Jason Gladstone

---

**From:** Karen Wackerman <karenrtm7@gmail.com>  
**Sent:** Friday, March 19, 2021 12:53 PM  
**To:** Cummings, Mike  
**Cc:** Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessen@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** Re: [EXTERNAL]Re: 3/19/21 Message

Mike -

When I read your email, I am so grateful that you are Fairfield's superintendent of schools. It is essential that our schools teach anti-racism and inclusivity.

Acknowledging that there is systemic racism in society (even in Fairfield!) is the first step toward trying to eliminate it. We all need to accept that without defensiveness, see it in our own behavior, and work to change it.

Thank you for this and for all you do.

Karen

P.S. While I am the RTM Moderator, I am writing this in my personal capacity and not on behalf of the entire RTM - although I sincerely hope that the entire RTM also supports your statements.

Karen Wackerman  
RTM Moderator  
RTM District 7 Representative  
203-984-1673

On Fri, Mar 19, 2021 at 12:04 PM Cummings, Mike <[MCUMMINGS@fairfieldschools.org](mailto:MCUMMINGS@fairfieldschools.org)> wrote:



## Jason Gladstone

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**Sent:** Friday, March 19, 2021 12:59 PM  
**To:** Karen Wackerman; Cummings, Mike  
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**Subject:** RE: [EXTERNAL]Re: 3/19/21 Message

Karen,

Thank you for your email. As the District 7 RTM Representative and RTM Moderator, I would like you to advise me as to which structure or institution is racist in Fairfield so that I may personally do everything to eradicate it immediately. We cannot tolerate it in this community. Please advise me as soon as possible.

Jason P. Gladstone, Esq.  
Lampert, Toohey & Rucci, LLC  
46 Main Street  
New Canaan, Connecticut 06840  
(p)203-972-8100 ext. 14  
(f)203-972-8716  
[Jason@ltr-law.com](mailto:Jason@ltr-law.com)

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## Jason Gladstone

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**Subject:** Re: [EXTERNAL]Re: 3/19/21 Message

Mike

Can you please elaborate on what issues the students and staff have to deal with every day  
Also what changes you are referring to

Thanks  
Tom

Sent from my iPhone

On Mar 19, 2021, at 12:03 PM, Cummings, Mike <[MCUMMINGS@fairfieldschools.org](mailto:MCUMMINGS@fairfieldschools.org)> wrote:

Good afternoon

I speak as Superintendent of Schools of the Fairfield Public Schools. In my capacity I am aware of the many issues which our students and staff confront every day. I speak to the need to change our behaviors so we are a more inclusive school system

Regretfully you would rather cast personal aspersions on me than be aware of what is happening in our schools.

Mike

## Jason Gladstone

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**From:** Linda Grace <ljgrace@optonline.net>  
**Sent:** Friday, March 19, 2021 1:28 PM  
**To:** Cummings, Mike  
**Cc:** photop33@gmail.com; Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoilluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; DGladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** Re: [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

Mr. Cummings,

When you receive a report that a student or group of students have been 'mocked', what steps do you take to investigate the charge before you blast out an email to the community? Is there any discussion around teaching a child to stick up for themselves when they experience an unpleasant encounter by a peer? Yes there should be zero tolerance for racism in any capacity however evil exists and bad people do bad things. That message should also be communicated to our youth.

Linda Grace

On Mar 19, 2021, at 12:49 PM, Cummings, Mike <MCUMMINGS@fairfieldschools.org> wrote:

We have reports of students being mocked for how they look and talk. I believe a conversation with our students would provide more light on how they feel and what they have had to face.

We address these on a case by case basis with the goal of educating students to understand how their actions hurt others. We also work with staff to listen more carefully to students when these issues are raised and to acknowledge how they can be hurtful.

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**Sent:** Friday, March 19, 2021 1:28 PM  
**To:** Jason Gladstone  
**Subject:** Re: [EXTERNAL]Re: 3/19/21 Message

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jason -

As I mentioned in my earlier email, I'm not speaking as RTM Moderator, because I can't speak on behalf of the full RTM.

I don't think we can discuss this unless you understand what is meant by the term "systemic racism". If you knew what that meant, you wouldn't ask which parts or departments in town are racist.

A year ago, I would have firmly denied that I was racist. But I have done a lot of reading and learning and now understand that I am. I have a lot of inherent beliefs instilled in me from birth from society (and even from my liberal parents!) that are racist. I believe that most Americans are racist, but not in the usual understanding of the word that we'll attack people of color or that we're bad people. It just means that we have assumptions and beliefs about people of color that should be questioned so that we can treat others as we want to be treated.

Best -

Karen

Karen Wackerman  
RTM Moderator  
RTM District 7 Representative  
203-984-1673

On Fri, Mar 19, 2021 at 12:59 PM Jason Gladstone <[Jason@ltr-law.com](mailto:Jason@ltr-law.com)> wrote:

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Jason P. Gladstone, Esq.  
Lampert, Toohey & Rucci, LLC  
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New Canaan, Connecticut 06840  
(p)203-972-8100 ext. 14

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**Sent:** Friday, March 19, 2021 1:28 PM  
**To:** Cummings, Mike  
**Cc:** photop33@gmail.com; Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoilluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; DGladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** Re: [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

Mr. Cummings,

When you receive a report that a student or group of students have been 'mocked', what steps do you take to investigate the charge before you blast out an email to the community? Is there any discussion around teaching a child to stick up for themselves when they experience an unpleasant encounter by a peer? Yes there should be zero tolerance for racism in any capacity however evil exists and bad people do bad things. That message should also be communicated to our youth.

Linda Grace

On Mar 19, 2021, at 12:49 PM, Cummings, Mike <MCUMMINGS@fairfieldschools.org> wrote:

We have reports of students being mocked for how they look and talk. I believe a conversation with our students would provide more light on how they feel and what they have had to face.

We address these on a case by case basis with the goal of educating students to understand how their actions hurt others. We also work with staff to listen more carefully to students when these issues are raised and to acknowledge how they can be hurtful.

---

**From:** Thomas Curran <photop33@gmail.com>  
**Sent:** Friday, March 19, 2021 12:37 PM

## Jason Gladstone

---

**From:** Laura Karson <laurarkarson@gmail.com>  
**Sent:** Friday, March 19, 2021 1:59 PM  
**To:** Karen Wackerman  
**Cc:** Cummings, Mike; Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; Tony.Hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.McCarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; DGladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** Re: [EXTERNAL]Re: 3/19/21 Message

Thank you Karen!

Sent from my iPhone

On Mar 19, 2021, at 1:38 PM, Karen Wackerman <karenrtm7@gmail.com> wrote:

Mike -

When I read your email, I am so grateful that you are Fairfield's superintendent of schools. It is essential that our schools teach anti-racism and inclusivity.

Acknowledging that there is systemic racism in society (even in Fairfield!) is the first step toward trying to eliminate it. We all need to accept that without defensiveness, see it in our own behavior, and work to change it.

Thank you for this and for all you do.

Karen

## Jason Gladstone

---

**From:** Thomas Curran <photop33@gmail.com>  
**Sent:** Friday, March 19, 2021 2:04 PM  
**To:** Cummings, Mike  
**Cc:** Linda Grace; Timothy Ihlefeld; Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; DGladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** Re: [EXTERNAL]Re: [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

Thank you Mike for taking the time to respond back  
I think most of us agree racism is bad and would love to get rid of it  
I also think it should be dealt with at home. I think it's my job to parent my child. The staff has enough to worry about

I just don't like being told I'm a racist because of the color of my skin.  
We are all different and that is what makes us all uniquely great  
Again, I appreciate your time

Sent from my iPhone

On Mar 19, 2021, at 1:46 PM, Cummings, Mike <[MCUMMINGS@fairfieldschools.org](mailto:MCUMMINGS@fairfieldschools.org)> wrote:

We continually work to build resilience in our youth. Teaching students to stick up for themselves does not address the underlying issues.

---

**From:** Linda Grace <[ljgrace@optonline.net](mailto:ljgrace@optonline.net)>  
**Sent:** Friday, March 19, 2021 1:28 PM  
**To:** Cummings, Mike <[MCUMMINGS@fairfieldschools.org](mailto:MCUMMINGS@fairfieldschools.org)>  
**Cc:** [photop33@gmail.com](mailto:photop33@gmail.com); Timothy Ihlefeld <[tcihlefeld@gmail.com](mailto:tcihlefeld@gmail.com)>; Jason Gladstone <[Jason@ltr-law.com](mailto:Jason@ltr-law.com)>; [bkupchick@gmail.com](mailto:bkupchick@gmail.com); [firstselectwoman@fairfieldct.org](mailto:firstselectwoman@fairfieldct.org); [scleary@fairfieldct.org](mailto:scleary@fairfieldct.org); [tony.hwang@cga.ct.gov](mailto:tony.hwang@cga.ct.gov); [brian.farnen@housegop.ct.gov](mailto:brian.farnen@housegop.ct.gov); [Cristin.MccarthyVahey@cga.ct.gov](mailto:Cristin.MccarthyVahey@cga.ct.gov); [laura.devlin@cga.ct.gov](mailto:laura.devlin@cga.ct.gov); [rtm@fairfieldct.org](mailto:rtm@fairfieldct.org); [Amiebelile@gmail.com](mailto:Amiebelile@gmail.com); [lcaramore@me.com](mailto:lcaramore@me.com);

## Jason Gladstone

---

**From:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>  
**Sent:** Friday, March 19, 2021 2:17 PM  
**To:** Timothy Ihlefeld  
**Cc:** Jason Gladstone; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi; jamarrin; nafisasm@yahoo.com; Alexandra D'Elia; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara; stephanie ortiz; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell; Mark McKenna; CT Fury 05; cohara001@gmail.com; Tom Grace; Kevin Cullinan; Robert Kenyon; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia; wjgj@prodigy.net; BOE MEMBERS; Warde Gridiron; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hilary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca; judithdesjar@yahoo.com; Leonard Petrucelli; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea  
**Subject:** RE: [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

Good afternoon

The district is working to address increasing diversity in our hiring practices, address bias in our curriculum, and develop professional learning for our staff to help them better address the needs of all students. All of these issues have been discussed in public with the Board of Education, no one is acting on their own.

Mike

**From:** Timothy Ihlefeld <tcihlefeld@gmail.com>  
**Sent:** Friday, March 19, 2021 1:48 PM  
**To:** Cummings, Mike <MCUMMINGS@fairfieldschools.org>  
**Cc:** Jason Gladstone <Jason@ltr-law.com>; bkupchick@gmail.com; firstselectwoman@fairfieldct.org; scleary@fairfieldct.org; tony.hwang@cga.ct.gov; brian.farnen@housegop.ct.gov; Cristin.MccarthyVahey@cga.ct.gov; laura.devlin@cga.ct.gov; rtm@fairfieldct.org; Amiebelile@gmail.com; lcaramore@me.com; KIAAIN4EVER@yahoo.com; emilyconks5@gmail.com; Laura Corsi <llcorsi@optonline.net>; jamarrin <jamarrin@aol.com>; nafisasm@yahoo.com; Alexandra D'Elia <adelia214@gmail.com>; imfaw@hotmail.com; tomandsuzy@optonline.net; jackiegallagher@prodigy.net; Linda Grace <lgrace@optonline.net>; Jenhofelder@gmail.com; eidieu11@gmail.com; priscillaigram@gmail.com; vihlefeld@gmail.com; Elke Kenyon <elkekenyon@gmail.com>; faiqakhalid83@yahoo.com; mck266@optonline.net; glendaoco@optonline.net; Jenn O'Hara <jennohara@comcast.net>; stephanie ortiz <stephortiz79@gmail.com>; amprossi@icloud.com; ftoslluku@yahoo.com; webmaster.dph@ct.gov; Jeff OConnell <oconnelljeff0750@gmail.com>; Mark McKenna <mckennam@me.com>; CT Fury 05 <nortizct80@gmail.com>;



cohara001@gmail.com; Tom Grace <tpgrace@optonline.net>; Kevin Cullinan <kjcullinan@aol.com>; Robert Kenyon <rkenyon\_2000@yahoo.com>; bdanazumi@yahoo.com; kevincon4665@gmail.com; ab\_igram@yahoo.com; dgladstone@sof328.com; Massimo D'Elia <md1374@yahoo.com>; wjgj@prodigy.net; BOE MEMBERS <BOEMEMBERS@fairfieldschools.org>; Warde Gridiron <wardegridiron@gmail.com>; davedefonce@yahoo.com; photop33@gmail.com; ethanshome@optonline.net; mangano68@yahoo.com; anaantonia29@hotmail.com; d.vyal@yandex.ru; michelle\_moore@me.com; kevin.moore@me.com; gregschmidt@gmail.com; schmidt386@gmail.com; hiliary1088@gmail.com; jon.plessner@gmail.com; Vigeant, Stacie <SVIGEANT@fairfieldschools.org>; garyvigeant67@gmail.com; jennohara21@gmail.com; erinmelson@gmail.com; Heather Petrecca <petrecca@att.net>; judithdesjar@yahoo.com; Leonard Petrucelli <petfam03@aol.com>; josephgulbin1@gmail.com; r.caramore@me.com; Clark, Andrea <ACLARK2@fairfieldschools.org>  
**Subject:** [EXTERNAL]Re: [EXTERNAL]Re: 3/19/21 Message

No Mike, nobody is casting personal aspersions, please dont claim otherwise.

You sent out an email this morning describing new policies of "equity work" to be implemented upon our schools and children, based on YOUR personal shame and belief that you may be a racist. You wrote that, nobody else. And, although you may hold that opinion of yourself, what and who gives you the right to project that upon all others?? And further, implement educational and institutional change??

In Ms. Wackerman's email response, she clearly indicates support for you but also points out that she is speaking for herself and her opinion, not the representation of the entire RTM. The use of the 1st amendment at its finest, as is this discussion. (By the way, bring back more Civics Teaching like Florida, it would help all.)

Mike, please explain in detail what "equity work" and other policies, lessons, actions you have taken as a result of your personal belief in systematic racism. The autonomy of which you operate from is frightening and unchecked apparently.

Thank you

Tim

On Fri, Mar 19, 2021 at 12:04 PM Cummings, Mike <[MCUMMINGS@fairfieldschools.org](mailto:MCUMMINGS@fairfieldschools.org)> wrote:

Good afternoon

I speak as Superintendent of Schools of the Fairfield Public Schools. In my capacity I am aware of the many issues which our students and staff confront every day. I speak to the need to change our behaviors so we are a more inclusive school system

Regretfully you would rather cast personal aspersions on me than be aware of what is happening in our schools.

Mike

## EXHIBIT C

Dear First Selectwoman Kupchick,

I am writing to you to ask you to publicly defend Superintendent Cummings' email sent out Friday, March 19th reconfirming his commitment to racial equity. The responses he received were so out of line. Since I am on the RTM D4, I was one of the recipients of an email chain initiated by Jason Gladstone in which the tone and tenor were so disrespectful and offensive. He was outraged that Mr. Cummings insinuated he was inherently racist, which couldn't be further from the truth. What Mr. Gladstone and others on the email chain exhibited is "white fragility," a discomfort and defensiveness on the part of a white person when confronted by information about racial inequality and injustice. Based on these responses, it is clear much work is needed in understanding racial bias. We must understand the truth that from the moment a color of person is born, the deck is stacked against them due to the color of their skin. Throughout the pandemic, Mr. Cummings has demonstrated steady leadership, always putting the best interests of our children first. He is to be commended for dealing with all the challenges Covid-19 has put on our children, teachers, administrators and parents. These are tough times for all of us, but tearing down an educator, accusing him of calling others racists, when in fact he was trying to share his own reflections and ask for everyone in the community to do better, will not lead to a stronger Fairfield. So I am asking you to speak up on his behalf and speak to the need for racial equity in our schools and town, which as demonstrated by the email chain, we so clearly need.

EXHIBIT D

Laura Karson

Just sharing my letter sent to Brenda today. She must defend the Superintendent. He has been through so much and deserves to be supported against such offensive email responses.



Like



Comment



Sharon Brodeur Pistilli and 37 others



Jean Augusta

This is great, thank you. Has she responded to you?

2w

Like

Reply



Laura Karson

[Jean Augusta](#) crickets so far!

2w

Like

Reply



Write a reply...



Kiersten Jennings Chou

Thank you for writing this.

2w

Like

Reply





Laura's Post

**FAIRFIELD STANDING UNITED**

Laura Karson · Mar 24 ·

Dear First Selectwoman Kupchick,

I am writing to you to ask you to publicly defend Superintendent Cummings' email sent out Friday, March 19th reconfirming his commitment to racial equity. The responses he received were so out of line. Since I am on the RTM D4, I was one of the recipients of an email chain initiated by Jason Gladstone in which the tone and tenor were so disrespectful and offensive. He was outraged that Mr. Cummings insinuated he was inherently racist, which couldn't be further from the truth. What Mr. Gladstone and others on the email chain exhibited is "white fragility," a discomfort and defensiveness on the part of a white person when confronted by information about racial inequality and injustice. Based on these responses, it is clear much work is needed in understanding racial bias. We must understand the truth that from the moment a color of person is born, the deck is stacked against them due to the color of their skin. Throughout the pandemic, Mr. Cummings has demonstrated steady leadership, always putting the best interests of our children first. He is to be commended for dealing with all the challenges Covid-19 has put on our children, teachers, administrators and parents. These are tough times for all of us, but tearing down an educator, accusing him of calling others racists, when in fact he was trying to share his own reflections and ask for everyone in the community to do better, will not lead to a stronger Fairfield. So I am asking you to speak up on his behalf and speak to the need for racial equity in our schools and town, which as demonstrated by the email chain, we so clearly need.



Write a comment...





## Laura's Post



Like



Comment



Sharon Brodeur Pistilli and 37 others



Jean Augusta

This is great, thank you. Has she responded to you?

2w Like Reply

1 

Laura Karson

Jean Augusta crickets so far!

2w Like Reply

1 

Write a reply...



Kiersten Jennings Chou

Thank you for writing this.

2w Like Reply

1 

Lauren Bishop Bové

Nicely written. 

2w Like Reply

1 

Philip Herr

Good letter

2w Like Reply

1 

Steven Sheinberg

Thank you Laura!

2w Like Reply

1 

Write a comment...



GIF



EXHIBIT E



Jason P Gladstone  
240 Jennie Lane  
Fairfield, CT 06824  
Jason@ltr-law.com

April 12, 2021

Laura Karson  
187 Buena Vista Road  
Fairfield, CT 06825-1676

RE: Defamation

Attention Laura Karson:

It has come to my attention that on March 24, 2021, you posted libelous statements on a Facebook group called "Fairfield Standing United" in connection with an email I sent to Fairfield Superintendent of Schools Mike Cummings. On that post, you stated that I was offensive, disrespectful, suffering from a malady called "White Fragility" and I was "tearing down an educator". Such statements are false, and were intended to injure my reputation, diminish my self-esteem, respect, goodwill, and confidence in the community. The defamatory statements were meant to excite an adverse, derogatory or unpleasant feelings or opinions against me.

As a direct result of those libelous statements, my reputation in the community has been damaged and I have been prejudiced in public estimation, all to my detriment.

This letter is to demand a full retraction of those statements in the same manner they were made, specifically on the Facebook group "Fairfield Standing United" or any other publication it was published.

Failure to retract the statements will result in a civil action against you.

Sincerely,

Jason P. Gladstone

JPG.jpg

Calabrese and Sreenivasan, LLC

EXHIBIT F



**Laura Karson** ► FAIRFIELD STANDING UNITED

Apr 21 · 🌐

On March 24, 2021, I posted a copy of an email I sent FS Kupchick asking for her support of Superintendent Cummings' email to parents about diversity and inclusion in the schools. In my email to her, I mentioned Jason Gladstone, who sent a group email to Superintendent Cummings objecting to his email. I characterized the tone and tenor of Mr. Gladstone's email as disrespectful and offensive and suggested that it exhibited white fragility and that he was "tearing down an educator." I understand that these comments offended Mr. Gladstone and I hereby retract them.



Like



Comment



Colleen Sullivan and Elizabeth Zezima

### All Comments ▾



**Heather Galladay Dean**

I'm sad you have felt pressured to retract.  
Did the FS ever defend Dr. Cummings as you requested?

2w Like Reply

2 🇺🇸



**Laura Karson**

[Heather Galladay Dean](#) not that I'm aware!!

2w Like Reply

2 🇺🇸 🤔



Write a reply...



**Elizabeth Zezima**

Likewise I look forward to his apology to Mike Cummings. Or a retraction of his comments.

2w Like Reply

6 🇺🇸



**Laura Karson**

[Elizabeth Zezima](#) Right!!!

2w Like Reply

3 🇺🇸



Write a reply...



**Cathy Rondano Curley**

I find Mr. Gladstone's behavior absolutely abhorrent. Not only was his original attack on Superintendent Cummings offensive and incredibly disrespectful, but his response to being (fairly) called out for it and his subsequent attack on you, [Laura](#), has been repugnant. The fact that he threatened you with legal action if you did not retract your statement was absurd enough, but the fact that he actually did so



Write a comment...





**Cathy Rondano Curley**

I find Mr. Gladstone's behavior absolutely abhorrent. Not only was his original attack on Superintendent Cummings offensive and incredibly disrespectful, but his response to being (fairly) called out for it and his subsequent attack on you, [Laura](#), has been repugnant. The fact that he threatened you with legal action if you did not retract your statement was absurd enough, but the fact that he actually did so DESPITE this retraction is reprehensible. COVID-19 has caused a massive backlog throughout CT's judicial system that the state is already struggling to catch up with. That Mr. Gladstone would burden it further with this ridiculous, frivolous, laughable action is utterly appalling. [http://civillinquiry.jud.ct.gov/CaseDetail/PublicCaseDetail.aspx?DocketNo=FBTCV215045439S&fbclid=IwAR3MBqYdre1BmZwYTc8tN0ZWggLnI5czgumh5yxSwo\\_PTQE6MiqhQxJVx4I](http://civillinquiry.jud.ct.gov/CaseDetail/PublicCaseDetail.aspx?DocketNo=FBTCV215045439S&fbclid=IwAR3MBqYdre1BmZwYTc8tN0ZWggLnI5czgumh5yxSwo_PTQE6MiqhQxJVx4I)

CIVILINQUIRY.JUD.CT.GOV

Object moved

1w Like Reply

9



**Theresa O'Neill**

[Cathy Rondano Curley](#) this is disturbing

1w Like Reply

4



**Cathy Rondano Curley**

[Theresa O'Neill](#) Very.

1w Like Reply

3



**Maria Tassone-Dipierro**

[Cathy Rondano Curley](#) report it to the CT Bar. There is a duty not to file a known frivolous suit. Let them make him answer for this.

1w Like Reply

8



Write a reply...



**Maria Tassone-Dipierro**

I'm sorry. Why is a retraction necessary? When you send a letter to public officials, it becomes public. If one of those public officials then requests action from our selectwoman, that is their job. Can our elected officials no longer have an opinion on a constituent's concern? Absolutely ridiculous. Where is the go fund me to help you with legal fees? I'm in.

1w Like Reply

10



**Hallie Levine**

[Maria Tassone-Dipierro](#) this is clearly designed to harass and intimidate Laura. She tried to appease him with a retraction and he went full throttle anyway. He has no legal case. There was no slander or defamation involved. It's my belief this individual will



Write a comment...





**Elizabeth Zezima**

When bullies become lawyers. He is a discredit to his profession.

He could very well be sued for his over the top slander and conspiratorial, groundless accusations against Mike. That would be far less frivolous.

He created a firestorm and then turned predator for self serving reasons by taking legal action against someone who called him out. Even after she yielded to his harassment and threats.

A counter suit would be more justified. The CT Bar Association needs to hear about this.

The negative publicity he is getting as a result of his own actions are potentially more injurious to his career. As would wide spread reading of his disgusting email to Mike. Self inflicted wound by an entitled and unhinged man who lost his mind over the subject of racism. How can anyone assassinate his character when he doesn't have any?

1w Like Reply

7



**Heather Galladay Dean**

[Elizabeth Zezima](#), will he have to take the stand and present evidence of harm? Will a therapist testify and support his claims? Will he have witnesses testify on his behalf that they will NEVER use his services again because of his diminished value? I notice that he's representing himself. Was there no attorney that would take this case?

1w Like Reply

3



**Laura Karson**

[Elizabeth Zezima](#) well said!!

1w Like Reply

3



**Laura Karson**

You always capture the situation with the most perfect words!

1w Like Reply

3



**Elizabeth Zezima**

[Laura Karson](#) thank you and they frequently get me in trouble! I'm sorry you're going through this at the hands of an angry predator. This guy needs an intervention of some sort. And to face the consequences of his actions.

1w Like Reply

3



**Elizabeth Zezima**

[Heather Galladay Dean](#) since he's probably reading this perhaps he's able, and willing, to answer these excellent questions. It



Write a comment...



and unhinged man who lost his mind over the subject of racism. How can anyone assassinate his character when he doesn't have any?

1w Like Reply

7  



**Heather Galladay Dean**

[Elizabeth Zezima](#), will he have to take the stand and present evidence of harm? Will a therapist testify and support his claims? Will he have witnesses testify on his behalf that they will NEVER use his services again because of his diminished value? I notice that he's representing himself. Was there no attorney that would take this case?

1w Like Reply

3  



**Laura Karson**

[Elizabeth Zezima](#) well said!!

1w Like Reply

3 



**Laura Karson**

You always capture the situation with the most perfect words! 

1w Like Reply

3  



**Elizabeth Zezima**

[Laura Karson](#) thank you and they frequently get me in trouble! I'm sorry you're going through this at the hands of an angry predator. This guy needs an intervention of some sort. And to face the consequences of his actions.

1w Like Reply

3 



**Elizabeth Zezima**

[Heather Galladay Dean](#) since he's probably reading this perhaps he's able, and willing, to answer these excellent questions. It seems like an abusive intimidation tactic otherwise. Would be nice to know how many times he has pulled this little stunt. A little research might be in order.

1w Like Reply

2 



**Laura Karson**

[Elizabeth Zezima](#) good idea!!

1w Like Reply

1 



Write a reply...



**Cindy McDonald**

This is an outrage. Justin Gladstone is a bully and his attacks are appalling. I am happy to join in supporting fighting his disgusting attacks for no reason whatever. What a total jerk.

1w Like Reply

4 



Write a comment...





**Maria Tassone-Dipierro**

I'm sorry. Why is a retraction necessary? When you send a letter to public officials, it becomes public. If one of those public officials then requests action from our selectwoman, that is their job. Can our elected officials no longer have an opinion on a constituent's concern? Absolutely ridiculous. Where is the go fund me to help you with legal fees? I'm in.

1w Like Reply

10



**Hallie Levine**

[Maria Tassone-Dipierro](#) this is clearly designed to harass and intimidate Laura. She tried to appease him with a retraction and he went full throttle anyway. He has no legal case. There was no slander or defamation involved. It's my belief this individual will not stop until he is ordered to by a judge. I will gladly chip in to help with Laura's legal fees. And once this is over he needs to be reported to the Connecticut Bar Association.

1w Like Reply

5



**Nicole Craig Stanton**

[Maria Tassone-Dipierro](#) I'm in for the legal fees also.

1w Like Reply

2



Write a reply...



**Elizabeth Zezima**

When bullies become lawyers. He is a discredit to his profession.

He could very well be sued for his over the top slander and conspiratorial, groundless accusations against Mike. That would be far less frivolous.

He created a firestorm and then turned predator for self serving reasons by taking legal action against someone who called him out. Even after she yielded to his harassment and threats.

A counter suit would be more justified. The CT Bar Association needs to hear about this.

The negative publicity he is getting as a result of his own actions are potentially more injurious to his career. As would wide spread reading of his disgusting email to Mike. Self inflicted wound by an entitled and unhinged man who lost his mind over the subject of racism. How can anyone assassinate his character when he doesn't have any?

1w Like Reply

7



**Heather Galladay Dean**

[Elizabeth Zezima](#), will he have to take the stand and present evidence of harm? Will a therapist testify and support his claims?



Write a comment...



EXHIBIT G



June 18

Gladstone—

You piece of -t right-wing snowflake! What the -k is the matter with you?! Nice try asking for a million dollars in damages. OMG, it would be hilarious if it weren't so pathetic...

I'm not necessarily saying that you, per se, are a racist, and I don't think that that was the gist of the statement that so offended you. Of course, you very well could be a racist at that, because the #1 go-to move of all racists is to claim that "I'm not racist." I will leave that one up in the air, as it is impossible for me to know for sure.

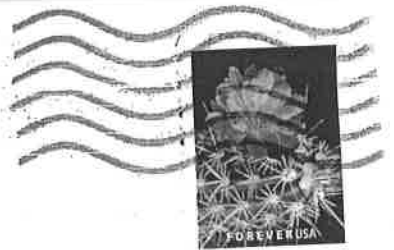
Nevertheless, that being said, you are totally a poster-boy for white, male privilege. As a graduate of FCDS and Fairfield Prep, you are as white and privileged and moneyed as they come. And as for your shyster lawyer act—again, suing \$1 million for your hurt little feelings!!!—well, that is just beneath contempt. For God's sakes, man up and stop being a baby, especially when the response to your idiocy was completely justified.

Regards,

The Voice of Reason

WESTCHESTER NY 105

21 JUN 2021 PM 4 L



Jason P. Gladstone  
c/o Lampert Toohey & Rucci, LLC  
46 Main St.  
New Canaan, CT 06840

06840-453399



**CERTIFICATION**

This is to certify that a copy of the foregoing was mailed via first class mail, postage prepaid, to all counsel and pro se parties of record, on the 24th day of June 2021 as follows:

NUZZO & ROBERTS LLC  
ONE TOWN CENTER  
PO BOX 747  
CHESHIRE, CT 06410

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